

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

LEONARD SMITH

Plaintiff,

v.

**NEW ENGLAND MOTOR FREIGHT,
INC.**

Defendant.

... : CASE NO. 5:12-CV-518- JRA

... : Judge John R. Adams

... : **MOTION TO TRANSFER VENUE
PURSUANT TO 28 U.S.C. § 1404(a)**

... : **Filed Electronically**

Defendant, New England Motor Freight, Inc. ("Defendant"), by its undersigned counsel, Fox Rothschild LLP and Zashin & Rich Co., L.P.A., respectfully moves this Honorable Court to transfer the venue of the above-captioned action to the United States District Court for the District of New Jersey, pursuant to 28 U.S.C. § 1404(a).

In support of the present motion, Defendant respectfully relies on, and incorporates by reference herein, the accompanying Memorandum of Law, and Declaration of Louis Natale.

WHEREFORE, Defendant respectfully requests that this Honorable Court grant their motion to transfer venue to the United States District Court for the District of New Jersey, pursuant to 28 U.S.C. § 1404.

Respectfully submitted,

Dated: May 7, 2012

By: s/ Stephen S. Zashin

Thomas A. Cunniff (0065311)
FOX ROTHSCHILD LLP
997 Lenox Drive, Building Three
Lawrenceville, New Jersey 08648-2311
Telephone: (609) 896-7656
Facsimile: (609) 345-7507
E-mail: tcunniff@foxrothschild.com

Stephen S. Zashin (0069775)
ZASHIN & RICH CO., L.P.A.
55 Public Square, 4th Floor
Cleveland, Ohio 44113
Telephone: (216) 696-4441
Facsimile: (216) 696-1618
E-mail: ssz@zrlaw.com

*Attorneys for Defendant,
New England Motor Freight, Inc.*

CERTIFICATE OF SERVICE

I certify that I on May 7, 2012, I electronically filed the foregoing “*Defendant’s Motion To Transfer Venue Pursuant To 28 U.S.C. § 1404(a)*” All parties and counsel will receive notice of this filing through the Court’s electronic filing system and may access the filing through the Court’s system.

s/Stephen S. Zashin

*One of the Attorneys for Defendant,
New England Motor Freight, Inc.*